

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YINGLU YAO, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiff,

vs.

FUWEI FILMS (HOLDINGS) CO., LTD.,
XIAOAN HE, JUN YIN, DUO WANG,
TONGJU ZHOU,

Defendants.

Case No. 07 Civ. 9416 (RJS)

MEIRA RUBIN, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

FUWEI FILMS (HOLDINGS) CO., LTD.,
XIAOAN HE, LIN TANG, MARK E.
STULGA, TONGJU ZHOU, DUO WANG,
JUN YIN, MAXIM GROUP LLC,
CHARDAN CAPITAL MARKETS, LLC, and
WR HAMBRECHT & CO. LLC,

Defendants.

Case No. 07 Civ. 10323 (RJS)

**NOTICE OF MOTION OF SIAMAK NAZHAND FOR (1) APPOINTMENT AS LEAD
PLAINTIFF; (2) APPROVAL OF HIS SELECTION OF LEAD COUNSEL; AND (3)
CONSOLIDATION OF ALL RELATED ACTIONS**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on a date and time designated by the Court, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Siamak Nazhand (“Nazhand”), will respectfully move this Court, pursuant to Section 27(a)(3)(B) of the Securities Act of 1933, for entry of an Order appointing Nazhand as Lead Plaintiff in the above-captioned actions, approving his choice of Dreier LLP as Lead Counsel for the Class, and consolidating all related actions herewith under Rule 42(a) of the Federal Rules of Civil Procedure. In support of this motion, Nazhand submits the accompanying memorandum of law and the declaration of Daniel B. Scotti.

DATED: December 18, 2007

DREIER LLP

By: /s/ Daniel B. Scotti

Daniel B. Scotti

Rebecca Tingey

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New York, New York 10022

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing to be served on this 18th day of December by ECF notification on the following:

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Chardan Capital Markets, LLC, and WR
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